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May 27, 2022

**Via ECF**

Honorable Ona T. Wang, U.S. Magistrate Judge  
United States District Court Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Courtroom 20D  
New York, NY 10007

RE: McKenna v. Santander Investment Securities, Inc., et al.; Case No.: 21-cv-0941-DLC

Dear Judge Wang:

Nelson Mullins represents Defendants Santander Investment Securities, Inc., Santander Holdings, USA, Inc. and Omar Kariuki (“Defendants”) in the above-captioned matter. Pursuant to the Court’s May 10, 2022 Order (ECF No. 85), Defendants and Plaintiff write jointly to inform the Court that they would like to have another Pre-Settlement Conference Scheduling call.

While the parties have entertained settlement discussions, the matter remains unsettled. The parties are prepared to continue their settlement discussions, and request the Magistrate Judge’s assistance in resolving their differences.

The parties have conferred and propose the following dates for the Pre-Settlement Conference Scheduling call: June 8, 13, or 14.

We thank the Court for its consideration.

Respectfully yours,

**NELSON MULLINS RILEY & SCARBOROUGH**

A handwritten signature in black ink, appearing to read 'M. Boyarsky', written over a horizontal line.

Mitchell Boyarsky  
Counsel for Defendants Santander Investment  
Securities, Inc., Santander Holdings, USA, Inc. and  
Omar Kariuki

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cc: Nicole Phe, Esq. (co-counsel for Defendants)  
Valdi Licul, Esq. (counsel for Plaintiff)  
John S. Crain, Esq. (counsel for Plaintiff)